

**From:** [David Ludwig](#)  
**To:** [Duncan Byers](#)  
**Cc:** [David Trinnes](#)  
**Subject:** RE: [EXT] RE: [EXT] RE: [EXT] Smith v. Atlas et al.  
**Date:** Wednesday, April 23, 2025 5:31:05 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Duncan,

You are grasping at straws. Rachel is acting as in-house counsel for Atlas North America. Which you well know because she was supposed to attend the settlement conference in this matter on behalf of Atlas before you derailed it.

Best regards,

**David Ludwig**

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**From:** Duncan Byers <[dbyers@dbyerslaw.com](mailto:dbyers@dbyerslaw.com)>  
**Sent:** Wednesday, April 23, 2025 1:33 PM  
**To:** David Ludwig <[dludwig@dbllawyers.com](mailto:dludwig@dbllawyers.com)>  
**Cc:** David Trinnes <[dtrinnes@dbllawyers.com](mailto:dtrinnes@dbllawyers.com)>  
**Subject:** [EXT] RE: [EXT] RE: [EXT] Smith v. Atlas et al.  
**Importance:** High

I need some clarification from you. In your letter of March 19, you stated “I ask you to make no further efforts to communicate directly with representatives of my client. . .” The only thing being discussed in your letter is the waiver sent to Rachel Morris. Rachel Morris is not a representative of your client Atlas; she is in-house counsel for ThyssenkruppAG according to the Florida Bar and her own LinkedIn page. So you can’t be referring to her, right?

**Duncan G. Byers**

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